

11044291789

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FEDERAL ELECTION
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2010 AUG 12 PM 12:57

OFFICE OF GENERAL
COUNSEL

August 10, 2010

Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C.
20463

MUR # 6352

Re: FEC disclosure violation by Robert J. Dold, Jr. and Dold for Congress Campaign

Dear Madame or Sir,

The purpose of this letter is to file a Complaint regarding what appears to be a violation of FEC regulations requiring candidates to report disbursements and debt for campaign expenditures on a timely-filed FEC Form 3. The respondents are Robert J. Dold Jr., candidate for Congress in the 10th Congressional District of Illinois and his campaign, Dold for Congress (referred to throughout as "Respondents").

The facts underlying this Complaint are as follows:

Beginning June 16, 2010, Respondents launched a bus tour of the 10th Congressional District, which Complainant believed lasted four days. See Attachments 1, from Dold website, Attachment 2, from Dold Facebook; Attachment 3, (2 pages) from Illinois Reason. These attachments are only a few of the sites with information about this bus tour, which was highly publicized by the Respondents.

However, no information about the expenses for the tour, including bus rental and related expenses, appears to be listed on Respondents' FEC Form 3, Schedule B (Itemized Disbursements) or Schedule D (Debts and Obligations) filed on July 15, 2010. This apparent omission is in stark contrast to Respondents' FEC Form 3, Schedule B, filed April 15, 2010 for a similar bus tour Respondents made before the February primary. The amount identified for that tour was \$15,100 with the purpose of disbursement identified as "Advertising: Bus Tour". Attachment 4, (3 pages) from Respondents' FEC Form 3 report, filed April 15, pages 1, 2 and page 178 from Schedule D; [markings are those of Complainant].

It is clear that Respondents knew that disclosure of these tour-related expenses was required and knew how to do it, as demonstrated by their April 15 filing. It is hard to imagine, therefore, an innocent explanation for Respondents' failure to report

what are likely significant expenses on their July 15 filing Mere oversight,
sloppiness or ignorance of the law are unlikely explanations given all the
circumstances in this matter

Please feel free to contact me if you have any questions.

Respectfully submitted,

Mary Stowell
Mary Stowell

Winnetka, Ill

60093

Mary Stowell
Mary Stowell

Signed and sworn before me this ^{11TH} day of AUGUST, 2010
August, 2010

SM

Notary Republic



DOLD

FOR CONGRESS



STAY CONNECTED

CONTRIBUTE

email address

zip code

SEND

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- [News & Press Releases](#)

- [Events](#)

- [Independence Day Parades](#)

- [Let's Get To Work Bus Tour](#)

- [Bus Tour - Day 1](#)

- [Bus Tour - Day 2](#)

- [Bus Tour - Day 3](#)

- [Bus Tour - Day 4](#)

[< Back to News Articles](#)

10th Congressional Candidate Dold on Campaign Bus Tour

Daily Herald, 6/16/2010

Robert Dold, a Kaneland Republican seeking the 10th District seat in Congress, appeared in Arlington Heights Wednesday with Village President Arlene Mulder to launch a campaign bus tour of the district.

Dold announced proposals, including reduced payroll taxes and easier credit, designed to encourage growth of small businesses.

Dold said in a release that he's concerned that current government activities are doing more to promote government jobs than private-sector jobs. Dold is facing Democrat Dan Suike, a Wilmette business consultant, in the November election.

FOR INFO: DOLD FOR CONGRESS

Dold For Congress | P.O. Box 8145 | Northfield, IL 60093 | 847-251-DOLD (3653) | info@doldforcongress.com | www.doldforcongress.com

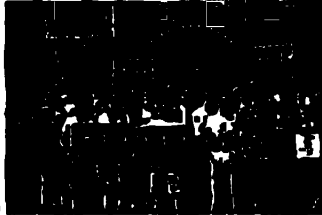
Attachment 1

11044291791

Dold Facebook page



Robert Dold just left downtown Highland Park Lots of people and lots of good music Some ice cream too Thanks again to all the supporters - some of my family wen joined us today and lots of friends along the way See you tomorrow!



June 17 at 9 28pm View Feedback (11) Share



Robert Dold Heading out of Waukegan after several great stops Just watched some of Mexico v France World Cup at Taquena Toluca in Waukegan Thanks to Jorge and his team for hosting us Headed on to Libertyville

June 17 at 2 21pm View Feedback (5)



Robert Dold Bus Tour Day 2- Started bright and early at train stations and went to a couple of restaurants Ready to spend a big portion of the day in Waukegan



June 17 at 10 47am View Feedback (2) Share



Robert Dold Fantastic first day on the Bus. Great energy and enthusiasm and I want to thank all the supporters, interns, families and friends who joined us today to get things started Starting bright and early tomorrow at train stations again! Check the Bus Tour 2010 tab for tomorrow itinerary.



June 17 at 8 21am View Feedback (4) Share

Attachment 2

11044291792

Illinois Reason

IL-10: Bob Dold's Magic Bus Tour Day Four – Moneyed Interests and Illegal Parking, Again, Updated x1

June 21, 2010 in Congressional Campaigns, Republicans | Tags Congress, Republicans, Democrats, Illinois, IL-10, GOP, 2010 elections, Bob Dold, Robert Dold, FICA taxes, bus tour | by robinsvacil

On Saturday, Day Four of the tour, Mr. Dold held his 'Family Fiesta' \$250 per family fundraiser (\$1000 for friends) in Lake Forest (Update: Lake County Eve has more details on the folks who hosted Mr. Dold's "Family Fiesta" event) The campaign actually double-booked Mr. Dold a bit during this high-dollar funder by listing another Lake Forest tour stop at 4pm and a later stop in Wheeling at 7:10pm

To a lot of folks, it is excruciatingly hypocritical to stick a fundraiser with a \$250 ticket smack dab in the middle of a self-proclaimed "Let's Get to Work" tour. Certainly families with \$250 to spare could and did attend but families in which one or both parents are out of work were clearly priced out of this event. It's unfortunate that politicians need to raise gazillions in this day and age of anything-goes political fundraising thanks to the conservative activist judges on the Supreme Court allowing corporations to influence elections (Both 10th CD candidates in this election are currently having high-dollar events within a few days of each other).

But, if Mr. Dold was trying to show family-oriented concern by being sensitive to the plight of our fellow Americans who have been unemployed for months on end (or longer) through his "Get to Work" tour he would have waited til after his tour was done to pursue such a high-priced source and ironically calling it a "Family" event.

Alas, he did not. Such is life.

Earlier in the afternoon, Mr. Dold was again in my neck of the woods at a tour stop in Recreation Park. Rec Park is the oldest park in our park district and with the original community center building built as a Works Progress Administration project.

I don't know if the moral dissonance dawned on anyone in the Dold campaign of a conservative fellow hosting a campaign event in a park paid for and maintained by the public and which features a gorgeous, historic WPA building — something today's conservatives would knowingly label "monstrous."

Unlike previous tour events I and others attended, this event had yard signs placed throughout the area. Signs were all along the north and west edges of the park as well as inside the park itself. Typically, Park District Ordinance 260 bans the placement of signs — whether political or not and whether temporary or permanent — in parks but when I asked about it I was told the campaign had obtained special permission.

This event was better attended than the previous tour stops I was aware of. It attracted about two dozen folks — adults and children. Like the Lake Forest money-maker, this was also billed as a fundraiser on the local township Republican website albeit at a more reasonable \$25 per ticket.

I had originally intended simply to hang by and have my kids burn off some steam at the playground. It turns out the event used the south end of the picnic grove which is right next to the playground so we ended up being 'surrounded' by the fundraiser's attendees. The event organizers were generous in offering some balloons, water, and bubble machines to my kids while we were there. They also used their loudspeaker to encourage pool-goers (the pool is kiddy-romantic to the picnic grove) to stop by for hot dogs, ice cream, etc. (As an FYI, according to Laura Fiala of Team America blog and other 10th District conservatives, when a campaign offers something of value for free to voters it's akin to bribing them for their vote, as with Dan Seals' highly successful gas station event a few years back. Mr. Fiala has not yet commented on whether he considers Mr. Dold's hot dogs to be bribes in exchange for votes.)

When the touring bus arrived, the Dold campaign managed to go 3 for 5 by once more parking their big gold bus illegally. Immediately, the bus was illegally parked between two no parking signs although, yet again, that particular location was right next to the gathering place so walking from the bus to the event was minimal. Belmont Avenue, where the bus was illegally parked, is a pretty busy north-south street. It's a bit narrow and with the playground right there parking is fishbowl as a matter of safety. Wing South was right across the corner street where the big gold bus was parked and it didn't allow legal parking, of which there was plenty that day.

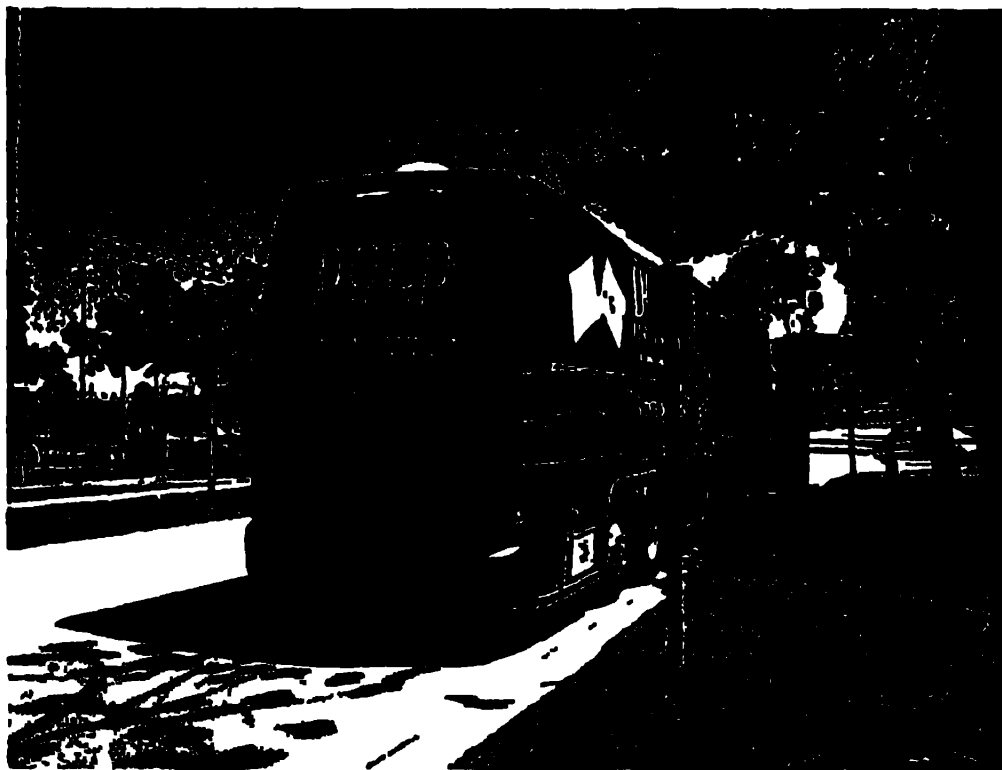
Seems to be a pattern of willfully disregarding local ordinances in favor of convenience for Mr. Dold and his entourage.

Here's a photo of Mr. Dold's big gold bus parked illegally in between no parking signs and in front of a fire hydrant. Plenty of legal street parking was available just around the corner from that hydrant.

Attachment 3, p1

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What is it with the Dold campaign parking their big gold bus illegally?

(Full disclosure I am a park commissioner with the Arlington Heights Park District, hence my familiarity with the local ordinance regarding signage. It applies to all political candidates/parties, businesses using signs to advertise, and the like.)

In the following posts I have a breakdown of key "highlights" from Mr. Dold's tour

Day One - The Launch..

Day Two - The Entourage in Full(ish) Effect

Day Three - So Bad The Campaign Faked Photos?

Day Four - Moneyed Interests and Illegal Parking, Again

Possibly related posts (automatically generated)

- IL-10 Bob Dold's Magic Bus Tour Day Two - The Entourage in Full(ish) E
- IL-10 Dold campaign succumbs to Illinois Reason pressure, fixes and removes mi
- IL-10 Bob Dold's Magic Bus Tour Flops - The Week That Was
- SUPER JUNIOR-M

5 comments

Comments feed for this article

June 21, 2010 at 7:16 am

IL-10 Bob Dold's Magic Bus Tour Flops - The Week That Was - Illinois Reason

[] Day Four - Moneyed Interests and Illegal Parking, Again Possibly related posts (automatically generated)Cart Culture 3 Blogroll []

Reply

June 21, 2010 at 4:28 pm

Slater

Attachment 3, p.2

April report

Image# 10030598205

04/15/2010 18:52

**FEC
FORM 3**

**REPORT OF RECEIPTS
AND DISBURSEMENTS**

For An Authorized Committee

Office Use Only

1 NAME OF
COMMITTEE (in full)

USE FEC MAILING LABEL
OR TYPE OR PRINT

Example if typing type
over the lines

Dold for Congress

ADDRESS (number and street)

PO Box 8145



Check if different
than previously
reported (ACC)

Northfield

IL

60083

8145

2 FEC IDENTIFICATION NUMBER

CITY

STATE

ZIP CODE

STATE DISTRICT

C00485871

3 IS THIS
REPORT

☒ NEW
(N)

OR

☐ AMENDED
(A)

IL

10

4 TYPE OF REPORT (Choose One)

(a) Quarterly Reports

☒

April 15 Quarterly Report (Q1)

☐

July 15 Quarterly Report (Q2)

☐

October 15 Quarterly Report (Q3)

☐

January 31 Year-End Report (YE)

☐

Termination Report (TER)

(b) 12 Day PRE Election Report for the

☐

Primary (12P)

☐

General (12G)

☐

Runoff (12R)

☐

Contest (12C)

☐

Special (12S)

Election on

In the
State of

(c) 30-Day POST-Election Report for the

☐

General (30G)

☐

Runoff (30R)

☐

Special (30S)

Election on

In the
State of

5 Covering Period

01

14

2010

through

03

31

2010

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete

Type or Print Name of Treasurer

Jeffrey George Bennett

Signature of Treasurer

Electronically Filed by Jeffrey George Bennett

Date

04

15

2010

NOTE Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 437g

Office
Use
Only

FEC FORM 3
(Revised 02/2003)

FE6AND18

Attachment 4, p1

11044291795

SUMMARY PAGE

FEC Form 3 (Revised 02/2003)

of Receipts and Disbursements

2 / 216

Write or Type Committee Name

Daid for Congress

Report Covering the Period

From

01 14 2010

To

03 31 2010

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6 Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	461926 74	920332 41
(b) Total Contribution Refunds (from Line 20(d))	0 00	0 00
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))	461926 74	920332 41
7 Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	278822 03	538924 78
(b) Total Offsets to Operating Expenditures (from Line 14)	911 75	997 08
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a))	277910 28	538927 70
8 Cash on Hand at Close of Reporting Period (from Line 27)	381546 35	
9 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0 00	
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	37484 13	

For further information contact

Federal Election Commission
 999 E Street, NW
 Washington, DC 20463
 Toll Free 800-424-9530
 Local 202-694-1100

FESAN018

11044291796

Attachment 4, p 2

April 2010

Image# 1083058382

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER
(check only one)

PAGE 178 / 216

☒ 17 ☐ 18 ☐ 19a ☐ 19b
20a 20b 20c 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (in Full)

Dold for Congress

A

Full Name (Last, First Middle Initial)

USPS - Winnetka

Mailing Address 512 Chestnut Street

City
Winnetka

State
IL

Zip Code
60093-2400

Purpose of Disbursement
Administrative/Salary/Overhead Postage

Candidate Name

001
Category/
Type

Office Sought ☐ House
☐ Senate
☐ President
State District

Disbursement For 2010
☒ Primary ☐ General
☐ Other (specify) ▼

Transaction ID B-E-1577

Date of Disbursement

02 / 14 / 2010

Amount of Each Disbursement this Period

178 00

B

Full Name (Last, First Middle Initial)

Victorystore Com

Mailing Address 5200 30th Street SW

City
Davenport

State
IA

Zip Code
52802-3039

Purpose of Disbursement
Advertising Promotional Items

Candidate Name

004
Category/
Type

Office Sought ☐ House
☐ Senate
☐ President
State District

Disbursement For 2010
☒ Primary ☐ General
☐ Other (specify) ▼

Transaction ID B-E-1575

Date of Disbursement

02 / 14 / 2010

Amount of Each Disbursement this Period

1257 00

C

Full Name (Last, First Middle Initial)

Nahigian Strategies LLC

Mailing Address 1001 19th Street N
Suite 1200

City
Arlington

State
VA

Zip Code
22209-1731

Purpose of Disbursement
Advertising Bus Tour

Candidate Name

004
Category/
Type

Office Sought ☐ House
☐ Senate
☐ President
State District

Disbursement For 2010
☒ Primary ☐ General
☐ Other (specify) ▼

Transaction ID B-E-1548

Date of Disbursement

02 / 15 / 2010

Amount of Each Disbursement this Period

15100 00

SUBTOTAL of Disbursements This Page (optional)

16533 00

TOTAL This Period (last page this line number only)

FEBAN018

FEC Schedule B (Form 3) (Revised 02/2008)

Attachment 4, P 3

11044291797